

PRESENTATION FOR MSHA PUBLIC MEETING - MAY 13, 2003

Good Morning:

My name is Lee Ptasnik of Mine & Process Service, Inc. based in Kewanee, Illinois. We are the North American distributor for the MAX Powered Respiratory Protection Helmet, as manufactured by Centurion Safety Products, Ltd. of the U.K.

Since the year 2000, we have been a proud supplier of the MAX helmets to underground mining operations throughout the United States. Presently, we have approximately 250 helmets in service, used on longwall faces and other applications in mines, including road grading and shotcreting.

The MAX Respiratory Protection Helmet has been applied at these mines as a personal protection device. Although considered to be a powered respirator in most countries around the world, there are a number of reasons why the MAX Respiratory Protection Helmet cannot be NIOSH approved. One reason is the NIOSH requirement that the filter media in such a device must be a HEPA Filter.

The MAX Powered Respiratory Protection Helmet passes very stringent requirements and tests, to assure protection of users from dust and particulates. The models we supply to mines are classified as a European THP2, which provides efficiency of no less than 95%. This means, in an atmosphere of 2mg per cubic meter of dust, less than .1mg of that dust would actually get through to the wearer of the MAX Helmet.

It is our belief that the HEPA Filter requirement by NIOSH limits the availability of protective equipment. It limits equipment that is user friendly and economical to operate, but which provides the high level of protection required to contain the dust and particulates personnel are exposed to in the mining environment. The powered air-purifying MAX Helmet significantly improves the miner's work atmosphere, because it was designed and is manufactured to protect users from the risk they are exposed to: dust and particulates.

We encourage a rule that allows a powered air-purifying respirator, based on the efficiency of the total device, for the particulate sizes which the user could be exposed to. Sufficient 3rd party test documentation could be provided for any powered air-purifying respirator, to be reviewed by MSHA, to ensure the level of efficiency and protection provided by that device.

Additionally, we believe any reference to a particular manufacturer or manufacturer's products in the proposed regulation should be removed. Specifically, the reference to RACAL, 3M, Minnesota Mining & Manufacturing Co., and the trademark name Airstream.

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Allowing for the use of powered air-purifying respirators that provide the level of protection required for the possible exposure risk, will actually expand the level of protection provided to coal miners. The devices will be more user friendly, more economical to operate, and more likely to be worn properly, without the user making modifications for comfort sake; adjustments that may decrease the level of efficiency and safety that they are provided, giving a false sense of protection.

We of MPS, Inc. and Centurion Safety Products, Ltd. appreciate the time extended to us today, and hope we will be able to continue to provide reliable and sound protection for the miners of the United States of America.